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UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

Market Test of Experimental Product – USPS Connect Local Mail

Docket No. MT2022-1

CHAIRMAN'S INFORMATION REQUEST NO. 3

(Issued December 7, 2021)

To clarify the basis of information provided by the Postal Service in its notice of intent to conduct the USPS Connect Local Mail market test,¹ the Postal Service is requested to provide written responses to the following questions. Answers should be provided to individual questions as soon as they are developed, but no later than December 14, 2021.

The questions are derived from a motion filed by the Package Shippers Association (PSA), which asserts that the "questions seek information that will allow participants and the Commission to better evaluate whether the proposed experimental product meets the applicable legal requirements, including 39 U.S.C. §§ 404a and 3641."²

The proposed questions 4 through 6 have been edited to restrict the scope of the question to the market test period. The proposed question 4 has also been revised to more broadly ask for information germane to the request. Additionally, the proposed question 6 has been edited to adapt the scope of the question to the criteria of 39 U.S.C. § 3641. The remaining questions are asked verbatim.

¹ United States Postal Service Notice of Market Test of Experimental Product – USPS Connect Local Mail, November 10, 2021 (Notice).

² Motion of Package Shippers Association for Issuance of Information Request, December 6, 2021, at 1 (Motion).

- Please confirm that other commercially available postage evidencing options
 approved by the Postal Service, including postage meters, PC Postage, Online
 Postage, ePostage, and other application programming interfaces, qualify as
 "other API approved account" or "other API accounts" for purposes of this market
 test. If not confirmed, please explain fully.
- 2. Please confirm that other commercially available postage evidencing options approved by the Postal Service, including postage meters, PC Postage, Online Postage, ePostage, and other application programming interfaces, will be able to connect with "other API approved account" or "other API accounts" to enable end customers to print and pay for postage for USPS Connect Local Mail. If not confirmed, please explain fully.
- 3. If questions 1 or 2 are not confirmed, please explain the rationale for limiting the payment options during the experimental market test period to "Click-N-Ship or other API accounts" as compared to other available postage evidencing options approved by the Postal Service, including postage meters, PC Postage, Online Postage, ePostage, and other application programming interfaces.
- 4. If questions 1 or 2 are not confirmed, please answer the following:
 - a. Please explain the rationale for the statement that, during the test period, the Postal Service does not intend to broaden the available payment for USPS Connect Local Mail.³
 - b. Please indicate if a mailer that lacks access to Click-N-Ship or other API accounts, but desires to participate in the test, will have an opportunity to do so. If so, how? If not, why not?

³ See Response of the United States Postal Service to Commission Information Request No. 1, November 30, 2021, question 3 (Response to CIR No. 1).

- c. If USPS Connect Local Mail becomes a permanent product, does the Postal Service intend to broaden the available payment options? If so, how? If not, why not?
- 5. If questions 1 or 2 are not confirmed, please explain how limiting payment channels during the test period will advance the stated goals of assessing demand for a same/next day local document delivery product when many of the target customers for USPS Connect Local Mail may likely utilize commercially available and USPS-approved payment evidencing options for mailing all other First-Class Mail products today.
- 6. Assuming that during the test period, the Postal Service intends to limit payment options to those it offers directly, as compared to other available payment options that it regulates, please explain how such a limitation does not create an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer, particularly in regard to small business concerns (as defined under 39 U.S.C. § 3641(h)). See 39 U.S.C. § 3641(b)(2).

By the Vice Chairwoman.

Ashley E. Poling